

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Wes Mackey, a Special Agent with the United States Secret Service, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. Affiant is an investigative or law enforcement officer of the United States within the meaning of 18 U.S.C. § 2510(7) and Federal Rule of Criminal Procedure 41(a)(2)(C), as a Special Agent of the United States Secret Service, Affiant is empowered to conduct investigations of, and, to make arrests for federal offenses.

2. I am currently employed as a Special Agent of the United States Secret Service (“USSS”), Cleveland Field Office Independence, Ohio for the last 3 years and am currently assigned to the Cleveland Field Office Cyber Fraud Task Force. I have received training in general law enforcement and criminal investigations from the Criminal Investigator Training Program at the Federal Law Enforcement Training Center in Glynco, Georgia, along with the U.S. Secret Service Special Agent training in Beltsville, Maryland. My law enforcement training and experience also includes the certification as a law enforcement officer in the Commonwealth of Kentucky and the State of Ohio, with approximately 5 years of experience as a deputy sheriff for the Boone County Sheriff’s Office. I additionally spent 3 years as a law enforcement officer for the Summit County and the Hamilton County Park Districts. I have received a Master of Science degree in Safety, Security, and Emergency Management with an emphasis in Homeland Security from Eastern Kentucky University. I have also received a Bachelor of Arts degree in Criminal Justice from Northern Kentucky University.

3. In my capacity as a Special Agent with the USSS, I have received training in and/or participated in and/or conducted investigations involving the following federal criminal offenses: counterfeiting of U.S. Treasury Notes, bank fraud, wire fraud, access device fraud, securities fraud, identity theft and money laundering.

4. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

5. As a result of my personal participation in this investigation and the written and oral reports made to me by Special Agents of the USSS and the Task Force Officers of the USSS Cyber Fraud Task Force, I am familiar with the facts and circumstances as set forth in this affidavit. Based on my training and experience and the facts and circumstances set forth in this affidavit, there is probable cause to believe that DILLON JAMES JODON (hereafter known as “JODON”) and others known and unknown to me have committed, are committing, and are conspiring to commit offenses involving:

- a. Conspiracy to commit bank fraud in violation of 18 U.S.C. § 1349; and
- b. Aggravated Identity Theft in violation of 18 U.S.C. § 1028A.

**FACTS AND CIRCUMSTANCES ESTABLISHING
PROBABLE CAUSE FOR ARREST**

6. On August 3, 2021, United States Secret Service Task Force Officer Dan Reilly informed Affiant that Hannah Shape (“Shape”) was identified on a traffic stop after leaving the Courtyard Marriott Hotel at 100 Springside Drive Akron, Ohio 44333. During the traffic stop,

Shape was identified as a defendant in an open federal case involving several other co-conspirators.¹ Shape was arrested on a local warrant and was transported to the Summit County Jail. TFO Reilly informed Affiant that Shape was operating a U-Haul rental truck, but that she refused to provide any information as to the person who rented and/or who was authorized to operate it. TFO Reilly reported that during an inventory search of the U-Haul rental truck, a Chime Visa Debit Card ending in 9575 was located in the front seat cup holder. The Chime Visa Debit Card was issued to T.P.²

7. TFO Reilly informed Affiant that upon further investigation that same day, he discovered DILLON JAMES JODON and Ragina Dempsie (“R. Dempsie”) were occupying hotel room 205 at the Courtyard Marriott hotel at 100 Springside Drive, Akron, Ohio 44333.³ TFO Reilly, along with other law enforcement officers from the Bath Police Department, obtained confirmation from the hotel staff that JODON and R. Dempsie were inside room 205 and that they had recently checked in. The staff indicated that JODON presented himself as A.C. to the front desk clerk, checked in, retrieved the room key, and charged the room incidental fee with T.P.’s Chime Visa Debit Card ending in 9575.⁴ TFO Reilly presented the hotel staff with photographs of JODON and R. Dempsie. The staff confirmed the photographs of both JODON and R. Dempsie matched the description of the individuals who checked into room 205.

¹ Hannah Shape is the lead defendant in U.S. v. Shape, et. al., Case No. 5:21CR393, before Judge Polster, and was charged with conspiracy to commit bank fraud, bank fraud, mail theft, and aggravated identify theft. Affiant was the case agent.

² The identity of T.P. was made known at the time of the swearing of this Affidavit.

³ Ragina Dempsie is also a defendant in U.S. v. Shape, et. al., Case No. 5:21CR393, before Judge Polster, and was charged with conspiracy to commit bank fraud, mail theft, and aggravated identify theft.

⁴ The identity of A.C. was also made known at the time of the swearing of this Affidavit

8. With the assistance of the hotel staff, Bath Police Department knocked on the door and JODON answered. R. Dempsie was immediately identified and arrested. JODON was also identified and was confirmed to have multiple, outstanding warrants. JODON sought medical attention and was transported to the Akron General Hospital by Bath EMS and Fire Department.

9. Inside the Courtyard Marriott hotel room 205 that JODON and R. Dempsie occupied, law enforcement officers found and seized 47 pieces of mail hidden underneath a mattress as well as a Circle K gas station receipt in plain view for \$6.56 that used the Chime Visa Debit Card ending in 9575.

10. On August 4, 2021, Affiant and TFO Reilly investigated the 47 pieces of mail and discovered that the mail contained numerous personal identifiers for 45 different individuals, including dates of birth, bank records, addresses, and other information commonly used to steal a person's identity.

11. On August 4, 2021, Affiant investigated the U-Haul rental truck driven by Shape the previous day. Affiant discovered Shape reserved and paid \$36.20 for the truck on August 3, 2021, with T.P.'s Chime Visa Debit Card ending in 9575.

12. On August 4, 2021, Affiant observed and identified JODON on video surveillance operating the same U-Haul rental truck at a Circle K gas station located at 3520 South Arlington Road, Akron, Ohio 44312. Affiant discovered JODON using T.P.'s Chime Visa Debit Card ending in 9575 to pay for food and drinks while at the Circle K gas station totaling \$6.56. The receipt from this purchase was the same receipt that was discovered in the Courtyard Marriott hotel room 205.

13. Due to the 47 pieces of mail belonging to other people, the Circle K gas station receipt for \$6.56, and the fact JODON was in direct contact with both Shape and R. Dempsie while at the hotel, Affiant believes that JODON is now an active participant in the same ongoing conspiracy to commit bank fraud and aggravated identity theft.

14. On August 5, 2021, the Courtyard Marriott hotel staff contacted TFO Reilly regarding additional items found inside JODON and R. Dempsie's hotel room during a room cleaning. Hotel staff informed TFO Reilly that they located additional items, but did not touch them. TFO Reilly went back to the hotel and seized an additional 33 business and personal banking checks, and 25 debit cards (none of which were in JODON or R. Dempsie's name).

15. In reference to the mail recovered from hotel room 205 on August 3, 2021, four of the 33 checks found on August 5, 2021, matched the same names and addresses of mail that were included within the 47 pieces of seized mail found on August 3, 2021, during the arrest of R. Dempsie. TFO Reilly additionally found two Ohio identification cards belonging to T.P. and A.C.

16. Affiant confirms that these items—other people's identification cards and financial documents—are of the same type of items found during the investigation of Shape and her co-defendants, and thus are indicative of the same conspiracy and scheme to commit bank fraud and aggravated identity theft.

17. On August 6, 2021, TFO Reilly interviewed T.P. via telephone and reported that they were was expecting to receive the Chime Visa Debit Card ending in 9575 in the mail at their residence in Akron, but never received it. T.P. stated that they did not give anyone permission or authorization to use the Chime Visa Debit Card ending in 9575.

18. Chime Financial/The Bancorp Bank is a financial institution, as defined under 18 U.S.C. § 20, the deposits of which were insured by the Federal Deposit Insurance Corporation.


VIOLATIONS OF LAW

19. The aforementioned schemes were in violation of conspiracy to commit bank fraud, in violation of 18 U.S.C. § 1349, because JODON and others, did knowingly and intentionally combine, conspire, confederate and agree together and with each other to commit a federal offense, that is, to devise and intend to devise a scheme and artifice to defraud a financial institution and to obtain any of the moneys, funds, credits, assets, securities, or other property owned by, or under the custody or control of, a financial institution, by means of false or fraudulent pretenses, representations, or promises, in violation of 18 U.S.C. § 1344.

20. In violation of Aggravated Identity Theft, 18 USC § 1028A, JODON during and in relation to committing conspiracy to commit bank fraud, knowingly transferred, possessed, or used, without lawful authority, a means of identification of T.P. and A.C.

CONCLUSION

21. Based on the forgoing facts, your Affiant respectfully submits that probable cause exists to believe that JODON has committed aggravated identity theft, in violation of 18 U.S.C. § 1028A, and conspiracy to commit bank fraud, in violation of Title 18 U.S.C § 1349, in the Northern District of Ohio, Eastern Division.



Wes Mackey
Special Agent
U.S. Secret Service

Sworn to via telephone after submission by reliable electronic means.
Fed. R. Crim. P. 3, 4(d), and 4.1, on this 2nd day of December, 2021.



Amanda M. Knapp
United States Magistrate Judge